

AO 91 (Rev. 11/11) Criminal Complaint

CLERK'S OFFICE U.S. DISTRICT COURT
AT ABINGDON, VA
FILED

OCT 10 2023

LAURA A. JUSTIN, CLERK
BY: A. Meade
DEPUTY CLERK

UNITED STATES DISTRICT COURT

for the

Western District of Virginia

United States of America)

v.)

Jordan Patrick Adams)

Case No. 1:23mj128

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 7, 2022 in the county of Wise in the
Western District of Virginia, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 922(g)(1)	Convicted felon in possession of a firearm
18 U.S.C. § 922(g)(3)	Unlawful drug user in possession of a firearm
26 U.S.C. § 5861(d)	Possession of an unregistered destructive device
18 U.S.C. § 842(i)(1)	Convicted felon in possession of explosives
18 U.S.C. § 842(i)(3)	Unlawful drug user in possession of explosives

This criminal complaint is based on these facts:

Please see attached affidavits

☒ Continued on the attached sheet.Jeffrey B. Storm

Complainant's signature

Honorable Magistrate Judge Pamela Meade Sargent

Printed name and title

Sworn to before me and signed in my presence.

Date: 10/10/23City and state: Abingdon, VAPamela Meade Sargent

Judge's signature

Pamela Meade Sargent

Printed name and title

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
ABINGDON DIVISION**

IN THE MATTER OF THE ARREST OF:
Jordan Patrick ADAMS

Case No. _____

**AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINTS AND ARREST WARRANTS**

1. Your affiant, Jeffery B. Starnes, a Special Agent with the Virginia State Police and a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Washington Field Division, Bristol Post of Duty, having been duly sworn, deposes and states as follows:

Introduction

2. I am an investigative law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18, United States Code, and am empowered by law to conduct investigations and make arrests for the offenses enumerated in Section 2516 of Title 18, United States Code.
3. I am employed as a Special Agent, Certified Bomb Technician with Virginia State Police. I have been employed with the Virginia State Police since 2000. I was promoted to Special Agent in 2011. I have been certified as a Bomb Technician since 2011. I am currently assigned to the Wytheville Field Division and am also a Task Force Officer with the ATF assigned to the Bristol, Virginia Field Office. Prior to becoming a Special Agent, I was a Trooper and assigned to Buchanan County for over 10 years. During my tenure in law enforcement, I have attended numerous schools and trainings hosted by ATF, FBI, the Department of Homeland Security, state and local law enforcement, and the Department of Justice, dealing in various techniques of investigating firearms, explosives, bomb making, post-blast analyses, narcotics, and criminal activity. I have taken part in numerous federal, state, and local investigations concerning violations of firearm, narcotics, and explosives laws.
4. Through instruction, training, and experience, I have become familiar with the manner and methods criminals use to manufacture, possess, and distribute firearms, narcotics, explosives, explosive materials, and destructive devices.
5. The information contained in this affidavit is based on my personal observations, observations of other law enforcement officers, observations of Confidential Informants (CIs) and Cooperating Sources (CS) as related to me, my review of official police and government reports, and consultation with other agents and officers involved in the

investigation. The information contained in this affidavit is provided for the limited purpose of establishing probable cause for arrest. The information is not a complete statement of all the facts related to this case.

Initial Summary of the Investigation

6. On August 7, 2022, the Wise County Sheriff's Office contacted the Virginia State Police (VSP) Bomb Squad to respond to a residence in Coeburn, Virginia, known as 3732 Lot #5 Rusty Road and/or 3718 Rusty Road, Coeburn, Virginia, with GPS Coordinates of N 36.91732/W 82.45895 (herein "ADAMS" Residence"), regarding possible explosive devices, and the residence possibly being booby trapped.
7. VSP SABT / ATF Task Force Officer (TFO), Jeffery Starnes responded to the scene. TFO Starnes spoke with members of the Wise County Sheriff's Office (WCSO) and WCSO Capt./ ATF TFO Larry Mullins, who stated that the WCSO had received information that a Jordan Patrick ADAMS has explosive devices in his residence and possible booby traps in the residence. TFO Mullins interviewed ADAMS' daughter, Cheyenne Adams. Cheyenne Adams stated that she and her boyfriend had been inside her father's residence, and she described seeing what they thought were devices.
8. The WCSO obtained a search warrant for the residence of ADAMS located at GPS Coordinates of N 36.91732/W 82.45895. The WCSO obtained information that the residence could have possible booby traps inside. A deputy who had responded to the residence saw what appeared to be the stock of a gun that appeared to be pointed towards a door of the residence.
9. During the search of the residence, four (4) suspected destructive devices and two (2) containers of energetic powders were observed in the residence.
10. This affidavit is submitted in support of probable cause for the issuance of arrest warrants for Jordan ADAMS for the following charges:
 - Jordan Patrick ADAMS for violations of 18 U.S.C. §§ 922(g)(1) and (3) (the term "firearm" is defined to include "any destructive device" pursuant to 18 U.S.C. § 921(a)(3)); 26 U.S.C. § 5861(d) (the term "firearm" is defined to include "a destructive device" pursuant to 26 U.S.C. § 5845(a)), and 18 U.S.C. §§ 842(i)(1) and (3).

COUNT I and II: Jordan ADAMS for violations of 18 U.S.C. §§ 922(g)(1), (3) and 18 U.S.C. §§ 842(i)(1) and (3)

11. On January 28, 2016, in Wise County, Virginia, Jordan Patrick ADAMS was convicted of felony embezzlement and felony distribution of controlled substances. ADAMS was sentenced to 5 years, with 4 years suspended, on each charge to run consecutively.

ADAMS was also convicted of a misdemeanor of abuse of an incapacitated adult on this date and sentenced to 12 months with 6 months suspended to run consecutively. ADAMS was placed on 2 years supervised probation followed by 2 years of unsupervised probation.

12. On June 28, 2018, in Wise County, Virginia, Jordan Patrick ADAMS was found guilty of violating his probation for the above offenses (misdemeanor abuse of an incapacitated adult, felony embezzlement, and felony distribution of controlled substances). The Judge sentenced ADAMS to 90 days confinement on each count to run concurrently.
13. On January 24, 2019, in Wise County, Virginia, the Judge found ADAMS guilty of again violating his probation for the offenses detailed above, and sentenced ADAMS to 6 months confinement on each count to run concurrently. ADAMS was ordered to continue his probation period upon release.
14. On July 25, 2019, in Wise County, Virginia, Jordan Patrick ADAMS was found guilty of violating his probation for the offenses detailed above. The Judge sentenced ADAMS to 3 years and 3 months confinement on each count to run concurrently.
15. On August 11, 2023, in Wise County, Virginia, Jordan Patrick ADAMS was convicted on 2 felony counts of Enter House to Commit Assault & Battery ETC, in violation of Virginia Code § 18.2-91, and one count of grand larceny. Adams was sentenced on all 3 counts to 20 years with 18 years and 8 months suspended to run concurrently. Adams will be placed on supervised probation for 4 years upon release.
16. The information detailed above from the certified copies of judgement and convictions from the Wise County Circuit Court show Jordan Patrick ADAMS is a convicted felon and prohibited from possessing explosives under 18 U.S.C. § 842(i)(1) and firearms and ammunition under 18 U.S.C. § 922(g)(1).
17. On August 7, 2022, the Wise County Sheriff's Office and the Virginia State Police Bomb Squad executed a state search warrant on ADAMS' Residence. During the search of the residence four (4) suspected destructive devices and two (2) containers of energetic powders were seized from the residence.
18. Based on the examination of the devices and powders conducted by SABT Starnes and SABT Duke, reports, photographic evidence, laboratory analysis and consultation with an ATF Explosives Enforcement Officer, it is believed that the devices recovered during the search of ADAMS residence on August 7, 2022, listed as ATF Item # 001, 002, 005 and 007 meet the definition of a "destructive device"—more specifically explosive bombs—as that term is defined in 26 U.S.C. § 5845(f). These devices are also classified and defined as a firearm 26 U.S.C. § 5845(a).
19. The suspected energetic powders recovered at the scene listed as ATF Item # 009 and 011 were determined by the ATF lab to be a mixture of double based smokeless powder and Hodgdon Pyrodex (a black powder substitute) both of which are an "explosive" as that term is defined in 18 U.S.C. § 841(d) and are subject to federal regulation. Mixtures of

double based smokeless powder and Hodgdon Pyrodex were also present in the devices recovered at the scene listed as ATF Item #001, 002, 005 and 007. The Hodgdon Pyrodex powder is manufactured by the Hodgdon Powder company at their facility located in Herington, Kansas, and therefore, was shipped, or transported in or affecting interstate commerce.

20. On August 16, 2022, SALT Duke photographed and examined the electric blasting cap/detonator listed as ATF Item #004 recovered from Adam's residence in Coeburn VA on August 07, 2022. The detonator is described as having a copper-colored metal body, blue writing that says, "DANGEROUS BLASTING CAP" and pink leg wires. There was no other identifiable marking located on the blasting cap/detonator. SALT Duke x-rayed the blasting cap/detonator. The x-ray image shows the primary high explosive material visible as it appears to be floating inside of the shell. The electric detonator/blasting cap appears to be a commercial electric detonator/blasting cap and not improvised. The electric detonator was identified as a Dupont Special Coal Mine Delay #2. The detonator was manufactured by the E.I. Dupont Company in Pompton Lakes, New Jersey, and therefore was shipped or transported in or affecting interstate commerce. The detonator is an "explosive" as that term is defined in 18 U.S.C. § 841(d) and (f) and is subject to federal regulation.
21. On August 16, 2022, TFO Mullins conducted a post Miranda interview with Jordan ADAMS. ADAMS initially stated he did not build them (bombs). ADAMS stated someone kicked the door in to the trailer while he and Brandi Davis (ADAMS wife) were gone. ADAMS was alluding to the fact someone put the bombs in the trailer while they were gone.
22. ADAMS stated he sometimes stays at the trailer located on Rusty Road Lot #5. ADAMS stated the address is 3719 Rusty Road Coeburn, VA. ADAMS stated the trailer is also listed as 3719 Dungannon Road Coeburn, VA.
23. TFO Mullins provided pictures of items recovered during search warrant to ADAMS.
24. ADAMS viewed a photo of ATF item #001, a device with latex glove attached. ADAMS recognized the device. ADAMS stated he thought it was a smoke bomb.
25. ADAMS viewed a photo of ATF item #002, a CVS prescription bottle device. ADAMS recognized the device stating it scared him.
26. ADAMS viewed a photo of ATF item #007, gauze wrapped with hose clamp device. ADAMS stated he recognized the device.
27. ADAMS viewed a photo of ATF item #009, a glass container with powder. ADAMS stated he recognized the item. ADAMS stated he harvested this powder by removing powder from roman candles, firecrackers, and cheap smoke bombs and then placed it into the glass container. There was a metal box in the picture with ATF item # 009.

28. ADAMS stated there was a Nugenix bottle (ATF item #011) containing powder located in a metal box in the trailer. ADAMS stated when he first moved into the trailer, he found the powder in a different bottle. ADAMS stated the bottle was cracked so he removed the powder and placed it into the Nugenix bottle.
29. ADAMS stated the green fuses came out of roman candles and an airplane looking firework.
30. ADAMS viewed a photo of ATF item #005, a film canister looking device. ADAMS stated he recognized the device. ADAMS stated he could not remember if there was powder or fishing sinkers in the canister.
31. ADAMS stated he suspected an unnamed co-conspirator built the CVS prescription bottle device. ADAMS stated the co-conspirator has prior military experience and came to the same trailer on Rusty Road with the CVS prescription bottle device. ADAMS stated the device contained a blasting cap. TFO Mullins asked ADAMS how he knew the device contained a blasting cap. TFO Mullins explained just looking at the device it could not be determined what was contained inside. ADAMS then stated the co-conspirator advised him the device contained a blasting cap. Adams stated he was aware the device could be dangerous.
32. ADAMS stated he attempted to build a bottle rocket that should have been behind the door inside the trailer.
33. TFO Mullins asked ADAMS if he may have told someone about the devices. ADAMS then stated he may have told Miranda Manies the day before the search warrant that there were pipe bombs in his house/trailer.
34. ADAMS stated he built the device with the latex glove that he previously identified by photo and said it was a smoke bomb. ADAMS stated he harvested the fuse that he used while making the device from a roman candle. ADAMS stated the powder inside of it came from the glass container that he previously identified from a photo. ADAMS stated when he built the device, he was high on methamphetamine. ADAMS stated he filled up some of the space inside the device with toilet paper. ADAMS stated he did this so he would not have to use as much powder. ADAMS stated he built the device to smoke out some honeybees. TFO Mullins asked about any other contents of the device. ADAMS was adamant nothing else was contained inside the device.
35. ADAMS stated he knew he should have contacted law enforcement.
36. ADAMS stated there should have been a galvanized pipe inside the metal box.
37. On July 17, 2023, SABT Duke, SABT Starnes and TFO Mullins conducted a post Miranda interview with Jordan ADAMS. The interview was conducted with the consent of ADAMS and his attorneys. During the interview, many topics were discussed. One of which were the devices and energetic material recovered from ADAMS' residence on

August 07, 2022. ADAMS stated that he harvested material from roman candles, used the black/dark powder and fuse that an unnamed co-conspirator brought, and put these items into the devices. ADAMS said this powder came from an unnamed co-conspirator and was the powder law enforcement recovered in the Nugenix pill bottle (ATF item #011). SA Duke asked ADAMS what he used as a container for the devices. ADAMS said PVC. SA Duke told ADAMS that there was a metal pipe inside one of the devices. ADAMS said he didn't remember that but that he screwed a metal pipe into one as a cap. SA Duke looked through his reports and showed a picture of the device with the metal clamp with the metal pipe inside. ADAMS apologized for making the devices and acknowledged he was not in a good way during that time, and accepted responsibility for the devices.

38. SA Duke recapped for clarification that the unnamed co-conspirator brought over the pill bottle device, a pill bottle with dark powder in it, blasting caps, the explosives book, and some fuse. ADAMS said yes. ADAMS said that he harvested some additional material from roman candles. SA Duke asked about the PVC pipe device that had a small wooden or bamboo tube inside of it. ADAMS said he had just watched a movie called Rocket Boys and wanted to see what they could build and what the devices would do. ADAMS said that he never lit one or tested any of the devices.
39. SA Duke showed ADAMS some photos from his report from the search warrant, and ADAMS identified the Nugenix bottle as the one the powder was in. ADAMS said that an unnamed co-conspirator brought it to his residence. SA Duke showed ADAMS a picture of the PVC pipe with the glove over it, with the bamboo tube in it. ADAMS said yes, that is the one he made to fly. SA Duke then showed ADAMS a picture of the small black device made from a film canister that contained powder and initiated by hobby fuse. ADAMS said this was supposed to be like an M-80, and that's all it was intended to be. SA Duke reiterated that ADAMS made the PVC device with the glove, the PVC/metal pipe device with the hose/pipe clamp on it, and the film canister device. ADAMS said the one with the clamp on it had a mixture, the film canister had powder from the pill bottle and the PVC device with the glove on it had a mixture. The mixture was material ADAMS harvested from fireworks mixed with the powder from the bottles recovered from the search warrant.
40. SA Duke asked about the pill bottle device with the blasting cap. ADAMS admitted that he had touched it and picked it up, but he never touched anything inside of it and did not build it. The way we (the police) found it was the way it came to him from an unnamed co-conspirator.
41. SA Duke asked if there were any firearms or ammo located during the search warrant at ADAMS' trailer. ADAMS said no, he could not be around guns and there were no guns there. The other agents confirmed there were no firearms other than the destructive devices located during the search.
42. SA Duke asked ADAMS about the talk of booby traps and the meth paranoia. ADAMS said he told people that his place was booby trapped to intimidate them so they would leave his stuff alone. SA Duke asked ADAMS how much meth a day he was using during the

time he made and possessed the explosives/devices. ADAMS said he was shooting a gram to gram and half a day. ADAMS said this went on for a year from June 2021 till July 2022. SA Duke asked about the paranoia and ADAMS said it was worse when he smoked meth.

43. Based upon the investigation, including but not limited to ADAMS' admissions, Jordan Patrick ADAMS is an unlawful user of or addicted to a controlled substance, as that term is defined in 21 U.S.C. § 802, and prohibited from possessing explosives under 18 U.S.C. § 842(i)(3) and firearms and ammunition under 18 U.S.C. § 922(g)(3).
44. The above facts are in support of probable cause for the issuance of an arrest warrant for ADAMS for knowingly possessing firearms and explosives in the Western District of Virginia on August 07, 2022 after having been convicted in a court of law of a crime punishable by a term of imprisonment exceeding one year and while being an unlawful user of or addicted to methamphetamine, a Schedule II controlled substance, in violation of 18 U.S.C. §§ 922(g)(1) and (3) and Title 18 U.S.C. §§ 842(i)(1) and (3).

COUNT III: Jordan ADAMS for violation of 26 U.S.C. § 5861(d)

45. On August 7, 2022, the Wise County Sheriff's Office and the Virginia State Police Bomb Squad executed a state search warrant on ADAMS' Residence. During the search of the residence four (4) suspected destructive devices and two (2) containers of energetic powders were observed in the residence.
46. During the post Miranda interviews with ADAMS on August 16, 2022, and July 17, 2023, detailed above in counts I and II, ADAMS admits his possession and/or manufacture of the devices listed as ATF items # 001, 002, 005 and 007.
47. Examination by SABT Starnes and SABT Duke of the devices listed as ATF items #001, 002, 005 and 007 were containers filled with an energetic material. The energetic material mixture was determined by the ATF lab to be smokeless powder and Hodgdon Pyrodex. The devices listed as ATF items # 001, 005 and 007 were initiated by hobby fuse. The pill bottle device listed as ATF item # 002 was filled with an energetic material mixture determined to be smokeless powder and Hodgdon Pyrodex and initiated by an electric detonator. The detonator is listed as ATF item #004.
48. Based on the examination of the devices conducted by SABT Starnes and SABT Duke, reports, photographic evidence, laboratory analysis, and in consultation with an ATF Explosives Enforcement Officer, it is believed the devices recovered during the search on August 7, 2022, listed as ATF Item# 001, 002, 005 and 007 meet the definition of a "destructive device"—more specifically explosive bombs—as that term is defined in 26 U.S.C. § 5845(f). These devices are also classified and defined as a firearm 26 U.S.C. § 5845(a).
49. On August 17, 2022, SABT Duke conducted a search of the National Firearms Registration

and Transfer Record (NFRTR). Jordan ADAMS does not have any destructive device registered. "Destructive device" is included in the definition of "firearm" under 26 U.S.C. § 5845(a).

50. On July 10, 2023, SABA Duke received an ATF lab report for fingerprint examination related to Item #001. The lab located a latent print which was recovered on a piece of PVC pipe fragment from Item #001. This fragment is listed by the lab as exhibit 1.7. The fingerprint was developed, photographed, and compared to prints submitted from Jordan ADAMS. The examiner determined the print located on exhibit 1.7 was that of Jordan ADAMS.
51. The above facts in this count indicate there is probable cause to believe that Jordan ADAMS violated 26 U.S.C. § 5861(d), in that he knowingly possessed a firearm (destructive device) not registered in the NFRTR, in the Western District of Virginia, on August 07, 2022.

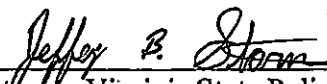
Conclusion

Based on the aforementioned information, I believe probable cause exists to conclude that the following persons committed the following violations within the Western District of Virginia:


- Jordan Patrick ADAMS, for violations of 18 U.S.C. §§ 922(g)(1) and (3), 26 U.S.C. § 5861(d), and 18 U.S.C. §§ 842(i)(1) and (3).

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on October 10th, 2023, in Abingdon, Virginia.


Jeffery Starnes Virginia State Police Special Agent/TFO
Bureau of Alcohol, Tobacco, Firearms & Explosives

SWORN AND SUBSCRIBED TO BEFORE ME
THIS 10th DAY OF October 2023


HONORABLE PAMELA M. SARGENT
UNITED STATES MAGISTRATE JUDGE

Reviewed by: AUSA Corey Hall